

Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CITY OF SEATTLE,

Plaintiff,

v.

HYUNDAI MOTOR AMERICA, INC and  
KIA AMERICA, INC.,

Defendant.

No. 2:23-cv-00098-JLR

**NOTICE OF PENDENCY OF OTHER  
ACTION**

Pursuant to Local Rule 3(h), City of Seattle hereby submits this Notice of Pendency of Other Action:

1. *In re: Kia Hyundai Vehicle Theft Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3052 (C.D. Cal.).

The MDL pending in the Central District of California involves substantially the same parties as the instant case and materially similar subject matter. The named defendants in the instant case are defendants in the MDL, and the conduct complained of—specifically, the failure to install engine immobilizers in numerous Hyundai and Kia vehicles—is the same. Although Plaintiff is the first municipal government to bring a public nuisance claim and the other cases in the MDL thus far are consumer product liability claims, Plaintiff believes

coordination in this matter would conserve resources and promote the efficient determination of the actions. Plaintiff therefore supports transfer under 28 U.S.C. § 1407.

RESPECTFULLY SUBMITTED this 24th day of January, 2023.

<p>CITY OF SEATTLE</p> <p>By <u>s/ Ann Davison</u> Seattle City Attorney</p> <p>By <u>s/ Thomas Kuffel</u> By <u>s/ Ghazal Sharifi</u> By <u>s/ Joseph Groshong</u> Ann Davison, WSBA #35776 Thomas Kuffel, WSBA #20118 Ghazal Sharifi, WSBA #47750 Joseph Groshong, WSBA #41593 701 5th Avenue, Suite 2050 Seattle, WA 98104 Phone: (206) 684-8300 Fax: (206) 684-8284 ann.davison@seattle.gov thomas.kuffel@seattle.gov ghazal.sharifi@seattle.gov joseph.groshong@seattle.gov</p> <p><i>Counsel for Plaintiff City of Seattle</i></p>	<p>KELLER ROHRBACK L.L.P.</p> <p>By <u>s/ Gretchen Freeman Cappio</u> By <u>s/ Derek W. Loeser</u> By <u>s/ Dean Kawamoto</u> By <u>s/ Ryan McDevitt</u> By <u>s/ Alison S. Gaffney</u> By <u>s/ Felicia J. Craick</u> Gretchen Freeman Cappio, WSBA #29576 Derek W. Loeser, WSBA #24274 Dean Kawamoto, WSBA #43850 Ryan McDevitt, WSBA #43305 Alison S. Gaffney, WSBA #45565 Felicia J. Craick, WSBA #54505 1201 Third Avenue, Suite 3200 Seattle, WA 98101 Phone: (206) 623-1900 Fax: (206) 623-3384 gcappio@kellerrohrback.com dloeser@kellerrohrback.com dkawamoto@kellerrohrback.com rmcdevitt@kellerrohrback.com agaffney@kellerrohrback.com fcraick@kellerrohrback.com</p>
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